## THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

SERGIO BONILLA, on behalf of himself and all others similarly situated,

Plaintiff,

VS.

ANCESTRY.COM OPERATIONS INC., a Virginia Corporation; ANCESTRY.COM INC., a Delaware Corporation; ANCESTRY.COM LLC, a Delaware Limited Liability Company, Defendants. CASE NO. 1:20-CV-07390

JUDGE VIRGINIA M. KENDALL

## **DECLARATION OF BENJAMIN R. OSBORN**

- I, Benjamin R. Osborn, declare:
- 1. I am an attorney and a member in good standing of the state bar of New York.
- 2. I represent Plaintiff Sergio Bonilla in this matter.
- 3. Attached as **Exhibit 1** is a true and correct copy Plaintiff's First Set of Requests for Production of Documents, which were served on January 3, 2022.
- 4. Attached as **Exhibit 2** is a true and correct copy of Plaintiff's Second Set of Requests for Production of Documents, which were served on February 18, 2022.
- 5. Attached as **Exhibit 3** is a true and correct copy of Plaintiff's First Set of Interrogatories, which were served on February 18, 2022.
- 6. Attached as **Exhibit 4** is a true and correct copy of Ancestry's Responses and Objections to Plaintiff's First Set of Requests for Production of Documents, which Ancestry served on February 16, 2022.
- 7. Attached as **Exhibit 5** is a true and correct copy of Ancestry's Responses and Objections to Plaintiff's First Set of Interrogatories, which Ancestry served on March 11, 2022.

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8. Attached as **Exhibit 6** is a true and correct copy of Ancestry's Responses and

Objections to Plaintiff's Second Set of Requests for Production of Documents, which Ancestry

served on March 21, 2022.

9. Attached as **Exhibit 7** is a true and correct copy of a letter I sent to Ancestry on

February 25, 2022, regarding its responses to Plaintiff's discovery requests.

10. Attached as **Exhibit 8** is a true and correct copy of a letter Ancestry sent in

response on March 7, 2022.

11. Attached as **Exhibit 9** is a true and correct copy of a letter I sent to Ancestry on

April 1, 2022, regarding its responses to Plaintiff's discovery requests.

12. On April 12, I conferred telephonically with Ancestry's counsel regarding

Plaintiff's discovery requests.

I declare under penalty of perjury under the laws of the United States of America that the

foregoing information is true and correct, based on my knowledge, information, and belief.

Executed on April 19, 2022.

/s/ Benjamin R. Osborn\_

Benjamin R. Osborn

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